

Gregory M. Fox, State Bar No. 070876
Meaghan A. Snyder, State Bar No. 279392
BERTRAND, FOX & ELLIOT
The Waterfront Building
2749 Hyde Street
San Francisco, California 94109
Telephone: (415) 353-0999
Facsimile: (415) 353-0990
E-mail: gfox@bfesf.com
msnyder@bfesf.com

Michael W. Barrett, City Attorney, State Bar No. 155968
David C. Jones, Deputy City Attorney, State Bar No. 129881
NAPA CITY ATTORNEY'S OFFICE
CITY OF NAPA
P.O. Box 660
955 School Street
Napa, CA 94559
Telephone: (707) 257-9516
Facsimile: (707) 257-9274

Attorneys for Defendants CITY OF NAPA and
NAPA POLICE OFFICER THOMAS KEENER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LUIS ALEJANDRE,

Plaintiff,

v.

CITY OF NAPA, NAPA POLICE OFFICER
THOMAS KEENER, and DOES 1 through 20,
inclusive,

Defendants.

Case No. C12-4985 JCS

**STIPULATION AND ~~PROPOSED~~ ORDER
MOVING MANDATORY SETTLEMENT
CONFERENCE**

At the Further Case Management Conference held on November 15, 2013 before Judge Joseph C. Spero, the above-case was referred to Magistrate Judge Nathanael Cousins for a Mandatory Settlement Conference (MSC). The MSC is currently scheduled for March 11, 2014.

The parties have met and conferred and agree to a continuance of the MSC from Tuesday, March 11, 2014 to Thursday, April 3, 2014 in Courtroom A to provide more time for investigation, research and attorney client discussion before the MSC.

Based on this good cause, the parties, acting by and through their respective legal counsel,

1 respectfully request that the Court continue the MSC from Tuesday, March 11, 2014 at 1:00 p.m. to
2 Thursday, April 3, 2014 at 10:30 a.m. in Courtroom A.

3 The parties must lodge and exchange their Settlement Conference Statements by March 27,
4 2014.

5
6 SO STIPULATED:

7
8 DATED: March 4, 2014

BENNETT & JOHNSON, LLP

9
10 By: _____/s/
11 WILLIAM C. JOHNSON
12 Attorneys for the Plaintiff
LUIS ALEJANDRE

13 DATED: March 4, 2014

BERTRAND, FOX & ELLIOT

14
15 By: _____/s/
16 GREGORY M. FOX
17 Attorneys for the Defendants
18 CITY OF NAPA and NAPA POLICE
19 OFFICER THOMAS KEENER
20
21
22
23
24
25
26
27
28

ATTORNEY ATTESTATION

I hereby attest that plaintiff's counsel Mr. Johnson has reviewed this stipulation and proposed order and authorized me to show his consent by his signature indicated by a conformed signature ("/s/") within this E-filed document.

Dated: March 6, 2014

/s/

Gregory M. Fox

ORDER

Having considered the stipulated request of the parties, and good cause appearing the Court orders as follows:

The Mandatory Settlement Conference will be continued from Tuesday, March 11, 2014 at 1:00 p.m. to Thursday, April 3, 2014 at 10:30 a.m. in Courtroom A.

Settlement Conference Statements to be lodged and exchanged by Thursday, March 27, 2014.

IT IS SO ORDERED.

DATED: March 10, 2014

